

UNITED STATES DISTRICT COURT  
DISTRICT OF MASSACHUSETTS

LONDON FLEET LIMITED, INC., et al.,

Plaintiffs,

v.

LONDON TAXIS NORTH AMERICA, INC.  
a/k/a LONDON TAXIS OF NORTH  
AMERICA, INC.,

Defendants.

Civil Action No.  
04-CV-12325-WGY

**UNOPPOSED MOTION FOR EXTENSION OF TIME  
TO RESPOND TO SECOND AMENDED COMPLAINT**

Pursuant to Local Rule 6(b), the defendant, London Taxis North America, Inc. a/k/a London Taxis of North America, Inc. ("London Taxis"), hereby moves this Court to extend the time by which London Taxis must respond to the Second Amended Complaint by thirty (30) days. As grounds for this motion, London Taxis states that:

1. On or about August 13, 2004, the plaintiff, London Fleet Limited, Inc. ("London Fleet"), filed a Complaint in the United States District Court for the Northern District of Illinois.
2. By Order docketed on October 22, 2004, pursuant to a motion brought by London Taxis, the Court for the Northern District of Illinois transferred this matter to the District Court for the District of Massachusetts.
3. A response to the Second Amended Complaint of London Fleet is due on November 12, 2004.

4. The parties presently are in settlement negotiations, and therefore are directing their time and energy toward resolution of the overall litigation. It is the parties' hope that this matter can be resolved without the need for further litigation.

5. By email dated November 5, 2004, counsel for London Fleet represented to defense counsel that he would not oppose a motion to extend the time in which to answer or otherwise respond by thirty (30) days.

### **CONCLUSION**

The defendant, London Taxis North America, Inc. a/k/a London Taxis of North America, Inc., respectfully requests that this Court grant a thirty (30) day extension of time for the filing of a responsive pleading to the Second Amended Complaint, such pleading then being due on or before December 13, 2004.

Respectfully submitted,

LONDON TAXIS NORTH AMERICA, INC.,

By its attorneys,

HOLLAND & KNIGHT LLP

/s/ Joshua C. Krumholz

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Dated: November 10, 2004

**CERTIFICATE OF SERVICE**

I, Joshua C. Krumholz, hereby certify that on this 10<sup>th</sup> day of November, 2004, I caused a true and correct copy of the *Unopposed Motion for Extension of time to Respond to Second Amended Complaint* to be served via facsimile and first class mail upon the following counsel of record:

Michael A. Stiegel, Esq.  
Helen M. Burke, Esq.  
Raymond M. Krauze, Esq.  
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/s/ Joshua C. Krumholz  
Joshua C. Krumholz